CERTIFICATE OF SERVICE

I certify under penalty of perjury that, pursuant to 28 U.S.C. §1746, on Friday, August 22, 2008, I served the accompanying Defendants' Memorandum of Law in Opposition to Plaintiff Board of Trustees of the District 6 Health Plan's Motion to Dismiss Defendants' Counterclaims and Motion to Strike and Affidavit of Joel E. Cohen, Esq. in Support of Defendants' Opposition to Plaintiff Board of Trustees of the District 6 Health Plan's Motion to Dismiss and Motion to Strike upon all those having appeared in this matter, and in accordance with the rules of this Court.

Dated: New York, New York August 22, 2008

NYK 1175267-1.054475.0022